

An Roinn Pleanála agus Forbartha Maoine Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8

> Planning and Property Development Department Block 4, Floor 3, Civic Offices, Wood Quay, D8

Planning and Urban Form Strategic Policy Committee – May 2022

Inchicore Retail Strategy No. 5 on the Agenda

Key Urban Villages in the Draft Development Plan and the role of Inchicore.

Report to Planning SPC

1. Introduction

Following the November special council meeting relating to the draft Dublin City Development Plan a number of motions were referred to various SPCs as the issue raised was not appropriate to the Draft plan process. One such motion related to the role of Key Urban Villages and seeking the addition of Inchicore to those identified as such in the Draft Plan.

The following motion (no.9) stated:

'To recognise Inchicore as a Key Urban Village and include same in maps and references'.

Planning Reason:

'Inchicore Village is a key artery into the city, but also a place where significant development will occur throughout the course of this plan. The village should be recognised as same and supported as such'.

In the Chief Executive's Response presented for consideration, the CE outlined that the identification of Key Urban Villages is linked to the retail hierarchy contained in the Regional Spatial Economic Strategy (RSES), which Dublin City Council must comply with. Key Urban Villages equate to level 3 of the retail hierarchy in the RSES; and Inchicore is not included in this level.

The recommendation was that the motion is not agreed and at the November meeting the motion was withdrawn with the agreement that a request be made to the Department of Housing, Local Government and Heritage and the Eastern and Midland Regional Authority to undertake a review of the Greater Dublin Retail Strategy.

2. Retail Planning Guidelines for Planning Authorities (2012)

The above Guidelines are the relevant reference document for the retail aspects of City, County, Local and Regional plans. The Guidelines state the importance of managing the development of retail; utilising hierarchies of towns/villages plus the careful application of caps on volume of retail to ensure that the retail is plan-led, sustainable and supports balanced town focussed regeneration without resulting in decline, blight and dereliction as retail consumption shifts to newer developed centres. The Guidelines recommend a multi-Authority approach to retail strategies and reference the Greater Dublin Area.

3. Retail Strategy for the Greater Dublin Area (2008-2016)

This Strategy, the second retail strategy prepared for the Greater Dublin Area (GDA, Dublin, Meath, Kildare and Wicklow); was jointly prepared by the seven Local Authorities and two Regional Authorities in place at the time (Dublin and Mid-East). It undertook a detailed analysis of retail spend in the GDA in relation to convenience and comparison shopping addressing levels of spending, locations, population catchments, and existing and planned retail provision. Following this analysis it set out a series of policy recommendations regarding future retail provision and a retail hierarchy for the GDA. This document was prepared prior to large-scale online shopping and using figures from the 2006 Census and financial figures prior to the economic crisis and for these reasons the volume of retail anticipated is now overscaled.

4. Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly (RSES) is the regional statutory planning context for the City Development

Plan. The retail strategy of the City Council; contained in the Development Plan, must be in keeping with to the retail strategy and hierarchy as contained in the RSES. Table 6.1 of the RSES sets out the retail hierarchy for the Region; defined into 5 pyramidal levels. Dublin City Centre is solely designated as Level 1 - Metropolitan Centre. The main county towns are level 2- Major Town Centres & County (Principal) Towns; which includes for example Naas, Swords and Tullamore. Level 3 is also defined, and for each Council a list of Level 3 -Town and District Centres and Sub-County Towns is defined. For Level 4 (Neighbourhood centres, Local Centres, Small Towns and Villages) and level 5 (Corner shops/Small Villages), it is the role of the relevant development plans to designate the role of each place as part of their retail strategy. Objective RPO 6.10 of the RSES also states that EMRA will support the preparation of a Retail Strategy/Strategies for the Region in accordance with the Retail Planning Guidelines for Planning Authorities 2021, or any subsequent update, to update the retail hierarchy and apply floorspace requirements for the Region. RPO 6.11 states that the retail hierarchy as defined in the RSES and based on the 2008 Strategy will be applied as until it is updated.

Key Urban Villages are defined by the RSES and the Retail Strategy (2008) as large scale centres of retail; offering at least one large supermarket of scale and a range of local retail and other services (such as banking); with a catchment of approximately 30-40,000 people.

5. Draft Dublin City Development Plan

The main aim of the Retail Strategy for Dublin City is to take a balanced and sustainable approach to the provision of retail in the City. It aims to continue to support the city centre retail sector as the prime retail location in the State. It also aims to promote and consolidate the role of the Key Urban Villages with an appropriate level of retail development and support the concept of a 15 minute city with a network of urban villages (both level 3 and level 4) providing a range of services locally to work and home.

Chapter 4 of the draft Plan deals with the approach to the inner suburbs and outer city and states:

Over the next plan period, the strategic approach is also to strengthen the hierarchy of urban villages in the inner suburbs and outer city and consolidate and develop them as key focal points for the communities that they serve. The urban centres can provide opportunities for good urban placemaking, are centres for local services and form a basis for sustainable city living. 12 Key Urban Villages (KUVs) have been identified in the city suburbs (refer to Chapter 7: The City Centre, Urban Villages and Retail and Appendix 2: Retail Strategy). It is envisaged that these will be strong spatial hubs and provide a range of retail, commercial, employment, community and other services. Urban villages will play a key role in developing the concept of a 15 minute city..

...Urban villages and smaller neighbourhood centres will also play a central role in developing the concept of a 15-minute city. This means people's daily requirements can be reached within 15 minutes by foot, bike or public transport.

The plan aims to continue to consolidate and environmentally upgrade these local centres'.

The retail strategy and designation of urban villages within the hierarchy in the Draft Plan is an accordance with the RSES hierarchy. In the City retail strategy, the Draft Plan describes the scale and role of each level of the hierarchy. (See Table 2, page 181 of Volume 2: Appendices).

A key issue for retail designations is the need for balance in the provision of retail and growth of retail development. There is a limit overall in the volume of retail and service spending available within the city region. This "pool" of demand can increase through population growth; supporting new retail development and new designations; but is can also fall; as has happened with the accelerated shift to online retail and service use. It is critical that each position of the hierarchy is scaled appropriately to avoid competition between proximate locations. Too many designated locations in the higher tiers will result in other high ranked locations losing their catchment and falling into decline and/or negate regeneration plans for such locations in need of investment. Such decline can result in serious loss of services and local retail to parts of the city; undermining a sustainable approach to planning and the 15 minute city concept.

Key urban villages are larger scale centres of retail and other services in the City. Decisions on designation of locations needs to be informed by an assessment of catchment of existing centres; scale of demand in the area; future demand and future growth areas and the volume of demand likely; all recognising the inter-related nature of these issues and preferably undertaken at a city region scale to recognise that retail and service catchments extend cross Council boundaries.

Inchicore has potential for growth as an urban village, with locational advantages (Luas and bus connections, proximity to Grand Canal, Lansdowne Valley Park, Irish National War Memorial Garden), imminent significant public investment in housing and infrastructure (Emmet Road regeneration project and Bus Connects) as well as a development strategy identify key projects that will enhance and strengthen the function of the Kilmainham Inchicore area (Kilmainham Inchicore Development Strategy). This is reflected in objective CSO13 of the draft plan which is 'To seek funding under Call 3 of the URDF for the planning, detailed design and construction of the Kilmainham and Inchicore Development Strategy projects'. A change from an urban village to a key urban village will not prevent needed investment and growth in Inchicore.

A decision as to whether the catchment of Inchicore is or will be large enough to justify changing the village from level 4 to level 3 needs to be carefully made; as a significant expansion of the retail offer in Inchicore could take from the catchment of the adjoining Key Urban Villages at Ballyfermot, Crumlin and (future planned) Naas Road. District Centres/Key Urban Villages are also significant hubs where higher density mixed use development; including residential use, will be promoted.

6. Review of the Greater Dublin Area (GDA) Retail Strategy

It is acknowledged in the RSES that the Retail Strategy for the Greater Dublin Area is dated and in need of review with section 6.5 stating:

'It is recognised that the floorspace thresholds detailed in the GDA strategy were prepared in a different economic climate and in many cases are still to be reached. In this regard, EMRA will support and drive the preparation of a new retail strategy for the Region under the requirements of the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, to update this hierarchy and apply floorspace requirements for the Region.'

A decision on preparing a retail strategy for the GDA is a collective one, requiring agreement from all relevant local authorities to work with the Regional Assembly and the Department to prepare a new Strategy. Where such agreement is given it is the role of the Regional Assembly to work with the Councils and the Department to begin the process of updating the Retail Strategy for the Greater Dublin Area. Such a review will enable a full review of changes in retail patterns, changed populations, new growth areas and a more tailored approach to the City's retail and settlement strategy can be shaped. As part of this analysis, the role of Inchicore and all other urban villages at both level 3 and level 4 can be fully reviewed.

Draft letters to both the RSES and the Department are included in the Appendix to this report.

Deirdre Scully,

Deputy City Planner.

Appendix – Proposed letters to the Department of Housing, Local Government and Heritage and the Eastern and Midlands Regional Assembly

Department of Housing, Local Government and Heritage,

Custom House,

Dublin 1

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To whom it concerns,

The retail strategy of the Dublin City Development Plan is highly dependent upon the 2008 Retail Strategy for the Greater Dublin Area, a document that is in need of review. During the draft Development Plan process for the new City Development Plan, this need has become clear.

Section 7.5.1 of the draft City Development Plan states:

The Retail Planning Guidelines, 2012 set out the retail planning framework for retail development. In accordance with these guidelines, retail policy for the city must be informed by a multi-authority retail strategy which would set out the retail hierarchy for the region and which would set out retail floorspace requirements for different settlements under the hierarchy. The existing 2008 – 2016 Retail Strategy for the Greater Dublin Area is considered out of date and a new multi-authority strategy for the region is required.

In the interim, the Regional Spatial Economic Strategy (RSES), for the Eastern and Midland Regional Assembly, 2019 sets out a retail hierarchy for the Eastern and Midland Region and it states that it will support and drive the preparation of a new retail strategy for the region.

It has been acknowledged at Regional Assembly and local authority level that the Strategy is not up to date having regard to the changes in retail profile, floorspace demand, the implementation of the NPF through designation of new growth locations; the emphasis on regeneration and brownfield. The following Regional Policy Objectives are included in the RSES:

RPO 6.10: EMRA will support the preparation of a Retail Strategy / Strategies for the Region in accordance with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, to update the retail hierarchy and apply floorspace requirements for the Region.

In accordance with the above Regional Policy Objectives, the City Council requests that Department support and encourage the undertaking of a review of the Retail Strategy for the Greater Dublin Area.

Eastern and Midland Regional Assembly,

3rd Floor North

Ballymun Civic Centre,

Dublin 09

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In accordance with the above Regional Policy Objectives, the City Council requests that the Regional Assembly take the lead in seeking agreement to commence a review and take the role of co-ordinating the review of the Retail Strategy for the Greater Dublin Area.

Deirdre Scully

Deputy City Planner